



UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DENIS TKACHUK,

Defendant.

NO. 3:23-cr-05136-RJB

**INFORMATION**

The United States Attorney charges that:

**COUNTS 1 – 3**

**(Wire Fraud)**

**A. Summary**

1. Beginning no later than August 2017, and continuing until August 2019, DENIS TKACHUK devised a scheme to steal medical equipment and supplies from his employers to sell online for personal profit. Over the course of the scheme, TKACHUK's total amount of personal profit was at least \$169,806.93.

**B. Background**

2. TKACHUK was a resident of Puyallup and Pasco, Washington. In 2013, TKACHUK completed a Biomedical Equipment Maintenance Technician Program and began working servicing and repairing medical equipment. Between January 2016 and

1 July 2017, he worked for Kaldec Regional Medical Center (Providence) in Richland,  
2 Washington. Between August 2017 and February 2018, TKACHUK worked at  
3 Harborview Medical Center in Seattle, Washington. Between October 2018 and August  
4 2019, TKACHUK worked at Providence St. Peters Hospital in Olympia, Washington.

5 3. During his employment at Providence St. Peters Hospital in Olympia,  
6 TKACHUK was a Biomedical Technician. As part of that position, TKACHUK was  
7 allowed to purchase non-capital items, i.e., items valued at less than \$5,000.00. A review  
8 of the hospital's inventory showed that between October 2018 and July 2019,  
9 approximately \$108,000.00 worth of medical equipment and supplies were missing and  
10 otherwise unaccounted for. Hospital staff determined that TKACHUK had ordered 471  
11 items during that timeframe, more than six times the amount of the next-highest ordering  
12 technician, which was 71. Hospital staff filed a police report regarding the missing  
13 inventory. On September 9, 2019, the hospital fired TKACHUK.

#### 14 **C. The Scheme to Defraud**

15 4. From on or about August 2017 to on or about August 2019, in Thurston and  
16 King Counties, within the Western District of Washington, and elsewhere, DENIS  
17 TKACHUK devised and intended to devise a scheme and artifice to defraud and to obtain  
18 money and property by means of materially false and fraudulent pretenses,  
19 representations, and promises.

20 5. The essence of the scheme and artifice to defraud was for TKACHUK to  
21 enrich himself by over-ordering medical equipment and supplies in the course of his  
22 employment, stealing the medical equipment and those supplies, or other medical  
23 equipment and supplies, from his employer, offering them for sale online, and keeping  
24 the proceeds of the sales for his personal use.

#### 25 **D. Manner and Means**

26 6. The following conduct was part of TKACHUK's scheme and artifice to  
27 defraud.

1           7.     TKACHUK was authorized to purchase some medical equipment and  
2 devices for hospital use. He also had access to medical equipment and supplies at the  
3 hospitals where he worked. TKACHUK was not authorized to remove medical  
4 equipment and supplies from the hospital for personal use, or to sell the medical devices  
5 and equipment.

6           8.     TKACHUK used his access to medical equipment and supplies and  
7 photographed them to advertise the items for online sale and on email. For example, on  
8 July 11, 2017, while he was at work at Kaldec Hospital, TKACHUK took a photo (file  
9 name IMG\_3529) of medical supplies, confirmed by the location data embedded in the  
10 photo. Tkachuk then sent the same photo via email to Wholesale Medical-Surgical,  
11 offering the pictured items for sale. Wholesale Medical-Surgical confirmed they wanted  
12 to purchase the items from TKACHUK and sent an email confirming price. TKACHUK  
13 stole and sold the items depicted in that photo to Wholesale Medical Supplies.

14          9.     TKACHUK also advertised the medical equipment and supplies on eBay  
15 and used his personal email accounts to communicate with individuals about their  
16 purchase of the medical equipment and supplies. For example, while he was at work at  
17 Providence St. Peters Hospital, TKACHUK took a photo (file name IMG\_2962) of a  
18 medical device, confirmed by the location data embedded in the photo. TKACHUK then  
19 advertised that item on eBay and sent the photo to the interested buyer on January 7,  
20 2019.

21          10.    TKACHUK sent invoices for the stolen medical equipment and supplies  
22 from his personal email accounts to buyers. TKACHUK accepted payment for the stolen  
23 medical equipment and supplies using, for example, his PayPal account and Zelle  
24 account. When accepting payment via PayPal, TKACHUK was in Washington and his  
25 buyer was in Michigan.

26          11.    Sometimes TKACHUK would find a buyer and then steal the medical  
27 equipment and supplies. Other times TKACHUK over-ordered medical equipment and

supplies, stole them, and then sold them. When dealing with Wholesale Medical Supplies, TKACHUK shipped the items, and the buyer provided payment upon receipt. When dealing with other buyers on eBay / PayPal, TKACHUK would receive payment prior to shipping the items.

12. The proceeds from the sale of the stolen medical equipment and supplies TKACHUK obtained as part of the scheme to defraud exceeded \$169,806.93.

#### **E. Execution of the Scheme to Defraud**

13. On or about the dates set forth below, at Thurston and King Counties, and elsewhere, for the purpose of executing and attempting to execute the scheme and artifice to defraud, DENIS TKACHUK knowingly transmitted, and caused to be transmitted, by wire communication in interstate and foreign commerce, the following signs, signals, pictures and sounds, each transmission of which constitutes a separate count of this Information:

Count	Date	Wire Transmission
1	9/14/2017	Wire of \$2,150.00 via PayPal from a purchaser in Michigan to TKACHUK's PayPal account -4868
2	11/9/2018	Wire of \$1,310.00 via Zelle from Chase account -1550 to TKACHUK's Bank of America account -9684
3	6/25/2019	Email from TKACHUK to a buyer in Michigan containing medical item descriptions and photos.

All in violation of 18 U.S.C. § 1343.

#### **FORFEITURE ALLEGATION**

The allegations contained in Paragraphs 1-13 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of any of the offenses alleged in Counts 1-3, DENIS TKACHUK shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), all property constituting or traceable to proceeds of such offense including, but not limited to, a sum of money representing the proceeds he personally obtained as a result of the offense.



1       **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendant,

- 3           a.     cannot be located upon the exercise of due diligence;  
4           b.     has been transferred or sold to, or deposited with, a third party;  
5           c.     has been placed beyond the jurisdiction of the Court;  
6           d.     has been substantially diminished in value; or,  
7           e.     has been commingled with other property which cannot be divided  
8                 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

12       DATED this 3rd day of May 2023.

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14                                 *Sarah G. Vogel, for*  
15                                 \_\_\_\_\_  
16                                 NICHOLAS W. BROWN  
17                                 United States Attorney

16                                 *Marci L. Ellsworth*  
17                                 \_\_\_\_\_  
18                                 MARCI L. ELLSWORTH  
19                                 Assistant United States Attorney

19                                 *Hillary K. Stuart*  
20                                 \_\_\_\_\_  
21                                 HILLARY K. STUART  
22                                 Assistant United States Attorney